

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALLIED WASTE NORTH AMERICA,)
LLC AND 623 LANDFILL, INC.,)

PLAINTIFFS,)

v.)

INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS, LOCAL 25, THOMAS G. MARI,)
INDIVIDUALLY AND AS PRESIDENT,)
STEVEN J.SOUTH, AS)
SECRETARY-TREASURER, JOAN C. COREY,)
AS VICE PRESIDENT/BUSINESS)
AGENT, PETER S. BERRY, AS RECORDING)
SECRETARY, MILTON DEPINA,)
INDIVIDUALLY AND AS UNION)
REPRESENTATIVE, NICO CATANO,)
INDIVIDUALLY AND AS UNION TRUSTEE,)
ERIC LOGAN, INDIVIDUALLY AND AS)
UNION REPRESENTATIVE, DAVID SMITH,)
INDIVIDUALLY AND AS UNION)
REPRESENTATIVE BRIAN J. HATCH,)
INDIVIDUALLY AND AS BUSINESS AGENT,)

CA: 1:25-cv-11990-BEM

And)

JOHN DOES 1-100; and all other conspiring,)
Acting in concert, or otherwise participating with)
Them or acting in their aid or behalf,)

Defendant.)

AFFIDAVIT OF ERIC LOGAN

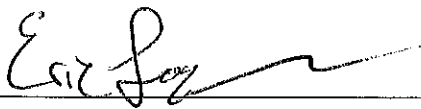
I, Eric Logan, depose and state the following:

1. I am over the age of twenty-one, make the statements contained in this Affidavit based on my personal knowledge, and I am competent to testify as to all facts stated herein.
2. I am employed as a Field Representative by Teamsters Local Union No. 25.

3. Local 25 and Republic Services were parties to a collective bargaining agreement dated July 1, 2020 through June 30, 2025.
4. Local 25 and Republic engaged in bargaining for a successor contract on April 29, May 13, 14, 20, June 12, 24, 25, 27, 30, July 2, 11 and 15, 2025. I was present for all of the bargaining sessions.
5. On July 1, 2025 at 12:01 am, Local 25 commenced a strike after the parties were unable to reach an agreement for a successor contract. To date, the strike is still going on and I have actively participated in the strike.
6. On July 2, July 11 and July 15, 2025 Local 25 and Republic bargained with the assistance of a federal mediator.
7. On July 1, 2025, I was present at the strike line at Republic's facility in Revere. I recognized Kurt Lavery, Market Vice President of Republic for the Northeast Area, pull into the Revere facility in a vehicle at approximately 2:00 a.m. I did not call Kurt Lavery any names as he suggests in his affidavit. I simply said "There's Kurt Lavery. Hey Kurt, why don't you come tell these guys [referring to Republic employees] what you said about them during negotiations?"
8. I also have had various conversations with multiple different police officers, including Sargent Hickey and Lieutenant Chuck Callhan from the Revere Police department, during the period that Local 25 has been on strike. Every time I approach the strike line, I would ask the police officer present if any individual was acting inappropriately. To my knowledge, there haven't been any arrests on any of the picket lines.

9. Lieutenant Callhan and Sargent Hickey have issued several directives for the participants to adhere to, including when the time is up to create an opportunity for trucks to exit the Revere facility, no bullhorns until after 7:00 a.m., and no music until after 7:00 a.m.
10. On only one occasion, on July 1, 2025 between midnight and shortly thereafter, when various picketers used flashlights in their hands, due to the lack of light at the facility, several police officers asked the picketers to not use them. The picketers immediately complied with the instruction.
11. At the Peabody facility, although I do not remember the officers names, various officers instructed the participants of the strike to refrain from using bullhorns to avoid any potential car accidents given the close proximity to Route 1 Highway, not to use radios or music until after 7:00 a.m., and to allow trucks to exit the Peabody facility. All the instructions were immediately complied with.
12. I have reviewed various affidavits submitted by Republic that refer to the a “deal” negotiated between me and the police on “wait times” when Republic trucks and drivers would be forced to wait before leaving or entering the site. These allegations are false. The police officers determined the wait time in accordance with what the police officers deemed appropriate given the public safety issues and traffic conditions. I, nor any participant of the strike, had any say on how long Republic trucks could be stopped. When I suggested a longer wait time, the police officers quickly told me “No way and too bad.”
13. Based on my experience, the police officers were always in total control of the manner in which the picket lines were conducted and their instructions were always obeyed.

Signed under the penalties of perjury this 16th day of July 2025.



Eric Logan, Field Representative, Teamsters Local 25